

Docket #05-015-1

“National Animal Identification System; Notice of Availability of A Draft Strategic Plan and Draft Program Standards”


Comments:

The SDAIB is supportive of a good uniform and functional animal identification system to enhance our nation’s ability to maintain animal health, food safety, and economic stability.

Specifically we make the following comments to be brief:

- (1.) A review of comments received on the website makes obvious the fact that a sister agency (FSA) has an orchestrated effort to suggest that agency administer the program. We hope these multitude of obviously orchestrated comments are considered as a single comment. It would seem that providing sharing of data pertaining to livestock premises or turning the whole program over to FSA and sharing movement data with APHIS and states may be most effective.
- (2.) It appears a mandatory system of ID is the only way to assure it is uniform and functional.
- (3.) It would appear that ID systems for disease control are functional when required prior to commingling and not earlier in the animal’s life.
- (4.) Specific “tagging sites” should be provided for, but we don’t see these as being widely used.
- (5.) The draft places tremendous burden on states re: many quotes from the draft: “states would have to meet” (with definite timelines) and the USDA “will successfully manage the program”. This mentality must change. The states can not be expected to collect and submit data to USDA where confidentiality is lost. Timelines and data submission should not be established until USDA can assure submitted data is confidential.
- (6.) Government management of data (repositories) has worked well in the past and will be the best in the future to maintain impartiality, availability, and ability to collect, maintain, and mine data necessary for animal health. The cost burden would otherwise be paid directly by the producer. An ID system is for the entire American people and costs should be born, for the most part, by government.
- (7.) It seems the goal of establishing a good uniform system of animal ID would be best began by “biting off” one section of the industry at a time. Cull breeding cattle and cull swine could be targeted for mandatory ID beyond the current backtagging systems in a reasonable short period of time. Identifying, tracking, and tracing these cull breeding animals would be something the entire industry could enact in a short time and would solve most animal health concerns while perfecting a system that could in the future expand to other segments of the industry.

Thank you for the opportunity to comment.



Sam D. Holland, DVM
State Veterinarian/Executive Secretary
SD Animal Industry Board